

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION

JOHN DOE,)	
)	
Plaintiff)	
)	
v.)	
)	
KRISTI NOEM, in her official capacity)	Civil No. 3:25-cv-00023
as Secretary of Homeland Security,)	
)	
and)	
)	
DEPARTMENT OF HOMELAND)	
SECURITY,)	
)	
and)	
)	
TODD LYONS, in his official capacity)	
as Acting Director of U.S. Immigration)	
and Customs Enforcement,)	
)	
Defendants.)	

**SUPPLEMENTAL FILING IN RESPONSE TO THE COURT'S QUESTIONS
AT THE HEARING ON THE MOTION FOR PRELIMINARY INJUNCTION**

At today's hearing on Plaintiff John Doe's Motion for Preliminary Injunction, the Court requested undersigned counsel to provide certain factual information in a supplemental filing. After consultation with the Department of Homeland Security and the Department of State, undersigned counsel has been informed as follows:

1. With respect to whether Plaintiff Doe could access a database to confirm that he is in lawful F-1 status, there is no general database that provides an overview of whether a nonimmigrant student is in lawful status. Nor is there a repository of this information that is accessible by the public.
2. The Department of State internally memorializes when a prudential revocation is effective immediately, and it will transmit notice of effective-immediately revocations to the Department of Homeland Security. Information that a visa is revoked prudentially is

provided on a case-by-case basis from the Department of State to the Department of Homeland Security, generally through direct communications between DHS-ICE personnel and State personnel.

Respectfully submitted,

ZACHARY T. LEE
Acting United States Attorney

Date: May 1, 2025

/s/ Laura Day Taylor
Laura Day Taylor
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CERTIFICATE OF SERVICE

I hereby certify that on May 1, 2025, I caused a true copy of the foregoing Supplemental Filing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will provide electronic notice to the attorney of record.

/s/ Laura Day Taylor
Laura Day Taylor
Assistant United States Attorney